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21 Attorneys for Plaintiff
22 KEVIN ROE

23 UNITED STATES DISTRICT COURT
24 EASTERN District OF CALIFORNIA

25 KEVIN ROE,

Case No. 2:22-CV-01536-KJM-AC

26 Plaintiff,

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE EXPERT WITNESS
DISCOVERY DEADLINES**

27 v.

28 CITY OF FAIRFIELD, a municipal

F D V W I D O R / # P R U T D U W \ / # T U D Q # / # T R E I Q V R Q / # D O S #
: 8 / # 7 2 x w k j d x h / # D 7 1 q x h / #
G d d / # F J w / # F d d i n u q d / # 7 3 4 8 #

1 corporation, SETH JAMEL, individually
 2 and in his official capacity as a Police
 3 Officer for the CITY OF FAIRFIELD
 4 Police Department, CAMILLE LANGI,
 5 individually and in her official capacity as
 6 a Police Officer for the CITY OF
 7 FAIRFIELD Police Department,
 OFFICER DEQUATTRO, individually
 and in his official capacity as a Police
 Officer for the CITY OF FAIRFIELD
 Police Department and DOES 1-50,
 inclusive, individually, jointly, and
 severally;

Hon. Kimberly J. Mueller

8 Defendants.

9
 10 Come now Defendants City of Fairfield, Seth Jamel, Joseph DeQuattro, and Camille
 11 Langi (“DEFENDANTS”) and Plaintiff Kevin Roe (“PLAINTIFF”) by and between their
 12 respective counsel of record, hereby agree and stipulate as follows:

- 13 1. WHEREAS, this matter is not currently scheduled for Trial.
 14 2. WHEREAS, March 20, 2023, the Court issued a Rule 16 Scheduling Order (Doc. 29),
 15 setting the following schedule:

Expert Disclosures Deadline	12/15/23
Rebuttal Expert Disclosures Deadline	1/26/24
Close of Discovery	2/23/24
Dispositive Motion Filing Deadline	4/12/24
Dispositive Motion Hearing	5/17/24

- 21
 22 3. WHEREAS, the parties were scheduled for Settlement conference before Magistrate
 23 Judge Allison Claire on October 3, 2023. (Doc. 31).
 24 4. WHEREAS, on September 29, 2023, Judge Claire issued an order Vacating the October 3,
 25 2023 settlement conference and resetting it for February 1, 2024. (Doc. 34).
 26 5. WHEREAS, counsel for both Plaintiff and Defendants have agreed to extend the cut-off
 27 for Expert Witness Disclosures to February 23, 2024, extend the rebuttal witness

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1 disclosure deadline to March 22, 2024.

- 2 6. WHEREAS, the parties do not seek an extension of the discovery cut off deadline,
3 currently set for February 3, 2024.
4 7. WHEREAS, counsel for both Plaintiff and Defendants have agreed to conduct Expert
5 Discovery *only* up to and including April 12, 2024.
6 8. WHEREAS, The parties submit that good cause exists for this continuance. There have
7 been no prior continuances.
8 9. WHEREAS, the parties request the Court to amend the case schedule as follows.

Expert Disclosures Deadline	2/23/24
Rebuttal Expert Disclosures Deadline	3/22/24
Close of Discovery	2/23/24 [no change]
Close of Expert Discovery	4/12/24
Dispositive Motion Filing Deadline	4/12/24 [no change]
Dispositive Motion Hearing	5/17/24 [no change]

15 IT IS SO AGREED

16 Respectfully submitted,

17 November 29, 2023

18 CASTILLO, MORIARTY,
19 TRAN & ROBINSON, LLP

20 By: /s/ John Robinson
21 PATRICK MORIARTY
JOHN B. ROBINSON
EDWARD VIEIRA-DUCEY
Attorneys for Defendant
CITY OF FAIRFIELD, SETH JAMEL, and
JOSEPH DEQUATTRO

22 Dated: November 29, 2023

23 PORTER SCOTT

24 By: /s/Carl. L. Fessenden
25 CARL L. FESSENDEN
SULI A. MASTORAKOS
Attorneys for Defendant,
CAMILLE LANGI,

1
2 Dated: November 29, 2023

LAW OFFICES OF JOHN BURRIS

3
4 By: /s/ Benjamin Nisenbaum

5 JOHN L. BURRIS
6 BENJAMIN NISENBAUM
7 CHRISTOPHER DEAN
8 Attorneys for Plaintiff
9 KEVIN ROE

10 **PROPOSED ORDER**

11 PURSUANT TO STIPULATION, IT IS SO ORDERED.

12
13 Dated: November 29, 2023

14 
15 ALLISON CLAIRE
16 UNITED STATES MAGISTRATE JUDGE

F D V W I D O R / # P R U I D U W \ / # T U D Q # / # T R E I Q V R Q / # D O S #
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